

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF PLAINTIFFS' DAUBERT
REPLY BRIEF TO PRECLUDE THE OPINIONS OF DEFENSE EXPERT LEE-JEN
WEI, PH.D.**

DANIEL A. NIGH, hereby certifies as follows:

1. I am an attorney at law within the State of Florida and a shareholder with the law firm of Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey, P.A., and serve as Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of the Plaintiffs' reply brief in support of their motion to preclude opinions of the testimony of Lee-Jen Wei, Ph.D.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of the September 14, 2021 Deposition Transcript of Lee-Jen Wei, Ph.D.
3. Attached hereto as **Exhibit 2** is a true and accurate copy of Lee-Jen Wei's August 2, 2021 Expert Report.
4. Attached hereto as **Exhibit 3** is a true and accurate copy of the *In re Taxotere Products Liability Litigation* (2019) Expert Report of Lee-Jen Wei (highlights added).
5. Attached hereto as **Exhibit 4** is a true and accurate copy of the *In re Bextra and Celebrex Marketing, Sales Practices and Products Liability Litigation* (2007) Expert Report of Lee-Jen Wei (highlights added).

6. Attached hereto as **Exhibit 5** is a true and accurate copy of *Chester Valley Coach Works v. Fisher-Price, Inc.*, 2001 WL 1160012 1, 4 (E.D. Pa. Aug. 29, 2001).

7. Attached hereto as **Exhibit 6** is a true and accurate copy of *Geiss v. Target Corp.*, 2013 WL 4675377 (D.N.J. 2013).

8. Attached hereto as **Exhibit 7** is a true and accurate copy of *In re Diet Drugs*, MDL 1203, 2001 WL 454586 1, *14 (E.D. Pa. Feb. 1, 2001).

9. Attached hereto as **Exhibit 8** is a true and accurate copy of *Player v. Motiva Enterprises LLC*, 2006 WL 166452 (D.N.J. 2006).

10. Attached hereto as **Exhibit 9** is a true and accurate copy of *R.D. v. Shohola, Inc.*, 2019 WL 6053223 1 (M.D. Pa. Nov. 15, 2019).

11. Attached hereto as **Exhibit 10** is a true and accurate copy of *Salinero v. Johnson & Johnson*, 2019 WL 7753453 1 (S.D. Fla. Sept. 5, 2019).

Dated: January 6, 2022

Respectfully submitted:

/s/Daniel A. Nigh
Daniel A. Nigh
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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/Daniel A. Nigh

Daniel A. Nigh

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